

#### AMERICAS-GROUP OF WORKABILITY INTERNATIONAL

The trade association for Affirmative Enterprises throughout the Americas that create job opportunities for persons with disabilities & disadvantages www.Americas-Group.org

## Statement of Americas-Group January 13, 2006

Regarding: 41 CFR Parts 51-2, 51-3, and 51-4

## "Nonprofit Agency Governance and Executive Compensation"

Proposed rule promulgated by Committee For Purchase From People Who Are Blind Or Severely Disabled

Americas-Group (AG) is a trade association representing more than thirty (30) notfor-profit (NFP) organizations throughout the Americas that are mission-driven to create job opportunities for persons who face barriers to employment as a result of being disabled and/or disadvantaged. In addition to NISH being a Member of AG, many of our other Members in the United States are JWOD producers, including some of the largest in the country. Currently AG's sole source of funding is annual dues paid by our Members.<sup>1</sup>

On behalf of our Membership, we appreciate the chance to comment on the proposed rule promulgated by the Committee for Purpose from People Who Are Blind or Severely Disabled regarding the governance and executive compensation for JWOD producers.

We first assert that AG and its Members strongly believe that it is vital for our Members – as well as *all* other NFP's – to uphold the highest standards of stewardship and transparent accountability for the funds they manage. In this regard, we are cognizant of the fact that when individual States grant a not-for-profit charter, the organizational grantee must take into account in everything it does that its "shareholders" are the taxpayers of its chartering State. As such, our Members recognize that they owe a duty of fiscal and programmatic accountability to the State that chartered them, the persons with disabilities and disadvantages they serve, their customers and contributors, as well as their own employees.

For these reasons, while AG strives to promulgate best practices in regards – among other things – to governance as well as executive compensation, we

<sup>&</sup>lt;sup>1</sup> A current AG Membership list is attached as Exhibit A.

respectfully take issue with some provisions of this proposed rule. Specifically, we wish to accept the Committee's invitation to propose alternatives to the following sections of the proposed rule.

#### Proposed changes regarding nonprofit governance:

(3) The board should have no fewer than five unrelated directors. Seven or more directors are preferable. The board chairperson should not also be serving as the nonprofit agency's CEO/President.

COMMENT: While AG believes that it is legitimate and useful to require that NFP's have so-called "unrelated directors" we believe that it is not in the best interest of JWOD producers to require a certain <u>number</u> of directors. Varying circumstances across the country make the requirement for firm numbers of a particular type of director unrealistic and virtually unenforceable. AG would support having a <u>percentage</u> of directors be qualified as "unrelated" for purposes of this rule.

(4) The organization's bylaws should set forth term limits for the service of board members.

COMMENT: While AG supports the idea of having three or four <u>classes</u> of directors – in other words, all directors are elected to serve a specific number of years depending on the class to which they are elected – we believe that directors should be eligible to serve additional terms if they are properly nominated and elected to do so at the conclusion of their service. Once again, imposing strict term limits across the board will not serve the interest of encouraging smaller and/or rural NFP's to participate in the JWOD program since they may be limited by their geographic location in terms of the number of qualified individuals who able and willing to serve.

# <u>Proposes changes regarding the effect of executive compensation on Fair Market Price determinations</u>:

(1) What is the threshold beyond which the compensation paid to the executives in a JWOD participating nonprofit agency should be considered as influencing a proposed fair market price determination?

COMMENT: AG believes that it is not appropriate – nor possible – to make a firm and fast rule that would cover this point. In some cases, without the involvement of highly compensated individuals, an NFP might not be able to develop and/or maintain the expertise to perform certain JWOD contracts. Primary responsibility for determining the appropriateness of executive compensation must rest with the board of directors, not with those responsible for administering the JWOD program. While it may be appropriate for each NISH Region, for example, to take account of an agency's total salary program when vetting the agency for new JWOD contracts, the

presence of highly compensated individuals in the NFP should not, in and of itself, be the sole reason for eliminating an agency from consideration for a contract.

Fair Market Price is a function of many things, not the least of which is the agency's ability to be competitive with its fellow JWOD producers. Agencies that compensate executives in excess of what some may consider "reasonable" cannot blithely pass along that additional overhead burden to the Federal customer through the JWOD program since other JWOD producers are likely to undercut the offending agency's Fair Market Price.

# (5) To what extent should there be a relationship between the pay and compensation of line workers and highly compensated individuals?

COMMENT: While this is a legitimate concern, <u>AG Members believe the ultimate</u> responsibility for determining whether or not the compensation ratios between executives and line employees are correct must lie with the boards of directors of individual agencies. This is because there is not one formula or ratio that can fit every circumstance, especially when NFP's must compete with for-profit companies for the services of experienced business managers willing to work in the NFP sector.

# (7) What approaches are available to identity and monitor nonprofit agencies executive compensation that would provide such information to the Committee routinely but without placing an undue burden on agencies?

COMMENT: Every State requires NFP's to report annually to a constitutionally elected or appointed officer of the State – often the attorney general – regarding a range of issues including largest donors, highest compensated individuals, etc. This information is publicly available – often it is posted on the internet – and can provide the Committee immediate access to monitor this issue without placing any additional reporting burden on the NFP agency.

\* \* \* \* \*

In summary, AG believes that it would not be prudent nor helpful to the JWOD program for a proposed rule to be promulgated that would seek to homogenize things such as the precise number of "unrelated directors" or specific formulas to determine what constitutes "excessive" executive compensation. These are matters best left to the boards of directors of individual agencies who can face civil and/or criminal penalties for abrogation of their responsibilities under their respective State statutes.

Finally, if the Committee wishes to gather more information to develop profiles of how individual agencies compare with regard to such matters as executive compensation, there already exist sufficient publicly available data that is collected by individual States to allow the Committee to do so without requiring any additional reporting by individual NFP's.

We appreciate having been offered the chance to submit this written statement in behalf of our Members, and we will be glad to respond to any written questions that the Committee or other interested parties may wish to pose regarding our statement.

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# **EXHIBIT A**

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The trade association for Affirmative Enterprises throughout the Americas that create job opportunities for persons with disabilities & disadvantages <a href="https://www.Americas-Group.org">www.Americas-Group.org</a>

### Statement on behalf of Americas-Group

# Opposition to Limiting or Eliminating Subminimum Wages

January 30, 2006<sup>2</sup>

Proposed rule promulgated by Committee For Purchase From People Who Are Blind Or Severely Disabled

AMERICAS-GROUP C/o OPPORTUNITY, INC.

<sup>&</sup>lt;sup>2</sup> This Statement prepared in response to questions/comments about Subminimum Wages raised at three hearings sponsored by Committee for Purchase from People Who Are Blind or Severely Disabled held on January 12, 19, and 26, 2006. The hearings were intended to receive comments on a Proposed Rule regarding "Nonprofit Agency Governance and Executive Compensation" (41 CFR Parts 51-2, 51-3, and 51-4).

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On behalf of our Membership, we appreciate the chance to comment on the issue of <a href="limiting or eliminating Subminimum Wages">limiting or eliminating Subminimum Wages</a> that came up during recent hearings sponsored by the Committee for Purchase from People Who Are Blind or Severely Disabled.

According to "Fact Sheet #39: The Employment of Workers with Disabilities at Special Minimum Wages" posted on the US Department of Labor (DOL) website, paying workers less than the Federal minimum wage is permissible under the following circumstances:

Section 14(c) of the FLSA [Fair Labor Standards Act of 1938, as Amended] authorizes employers, after receiving a certificate from the Wage and Hour Division, to pay special minimum wages - wages less than the Federal minimum wage - to workers who have disabilities for the work being performed. The certificate also allows the payment of wages that are less than the prevailing wage to workers who have disabilities for the work being performed on contracts subject to the McNamara-O'Hara Service Contract Act (SCA) and the Walsh-Healey Public Contracts Act (PCA).

A worker who has disabilities for the job being performed is one whose earning or productive capacity is impaired by a physical or mental disability, including those relating to age or injury. Disabilities which may affect productive capacity include blindness, mental illness, mental retardation, cerebral palsy, alcoholism and drug addiction. . .

Section 14(c) does not apply unless the disability actually impairs the worker's earning or productive capacity for the work being performed. The fact that a worker may have a disability is not in and of itself sufficient to warrant the payment of a special minimum wage.

The DOL website also clearly states that, "Employment at less than the minimum wage is <u>designed to prevent the loss of employment opportunities for these individuals</u> [emphasis added]." This statement constitutes the primary basis for AG's opposition to limiting or eliminating Subminimum Wages.

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<sup>&</sup>lt;sup>3</sup> A current AG Membership list is attached as Exhibit A.

<sup>4</sup> http://www.dol.gov/esa/regs/compliance/whd/whdfs39.htm

AG Members support the general proposition that persons with disabilities – including persons with the most severe disabilities – should have the opportunity to earn as much as possible when they work. We also support, however, the proposition that <u>all</u> persons with disabilities increase their chances of developing to their greatest potential through work. If in the interest of trying to help persons with severe disabilities earn more income, public policy actually makes these persons less employable, this well intentioned move may actually <u>reduce</u> their earned income from something below Minimum Wage to zero.

We summarize our concerns about any proposals to limit or eliminate Subminimum or "Commensurate" Wages below::

1. Without being able to utilize Subminimum Wages based solely on individual productivity, the already high unemployment rate for those with the most severe disabilities will rise dramatically. While some of AG's members have transitioned from paying Subminimum Wages to paying at least the Federal Minimum Wage when economic conditions allow, many of our not-for-profit (NFP) Members still face the choice of continuing to use Subminimum Wages to compensate those with severe disabilities or having to hire only more productive workers who are not severely disabled.

If restrictions are enacted on the use of Subminimum Wages, some AG Members will be forced – for economic reasons – to hire, for example, only higher functioning persons with disabilities who can produce closer to 100% of Industrial Standard rather than lower functioning persons who may work at only12% to 15% of the Standard. One unintended consequence, therefore, of this well intended change would be to increase unemployment for the most severely disabled.

- 2. <u>No evidence has been presented that the practice of using Subminimum Wages is being abused</u>. The combination of unannounced DOL audits, coupled with stiff penalties imposed by DOL when violations are alleged, has served as an excellent deterrent to those who would abuse the use of Subminimum Wages. *To some extent, therefore, we may be trying to fix a "problem" that does not exist.*
- 3. Persons with severe disabilities already have the choice *not* to work for employers who pay Subminimum Wages. These persons are free to offer their talents to employers on the open labor market. Unfortunately, however, economic conditions today especially outsourcing to cheaper labor markets offshore make their chances of being hired and retained by for-profit employers who must compete in a global market virtually nil.

Contrary to good intentions of those advocating placing restrictions or eliminating Subminimum Wages, therefore, these proposals will actually *reduce* choice by eliminating many persons with severe disabilities from being able to participate at all in their local labor markets.

- 4. <u>Labor markets vary widely across the country</u>. The challenge of creating employment opportunities for persons with severe disabilities especially those whose productivity may be as low as 10% or 15% percent of Industrial Standard varies widely throughout the country. Persons with severe disabilities who live in a Northeast or Midwestern industrial metropolitan area where there are a wider range of not-for-profit and for-profit employment opportunities may be less severely impacted by restricting the use of Subminimum Wages than the vast majority of persons with *severe* disabilities who live in rural areas or smaller cities. Experience with public policies that attempt to "help" persons with severe disabilities has too often shown that "one size fits all" solutions often impede opportunity.
- 5. Subminimum Wages can provide a chance for persons with severe disabilities to receive vocational training that they otherwise might not be able to access. Some AG Members pay persons with severe disabilities Commensurate Wages during the time they are trying out new or more challenging work. If our Members are limited in or prohibited from using Subminimum Wages, there will be a chilling effect on Members willingness and ability to let persons with severe disabilities try new jobs.

For all of the above reasons, therefore, AG wishes to go on record as opposing any changes to the use of Commensurate Wages that go beyond those already imposed by the FLSA. We will be happy to provide, though our President, Board of Directors, and/or individual Members, more detailed comments on this issue should the Committee wish to call for same. In the meantime, if there are questions about these comments, please feel free to contact Larry Rosser, President of Americas-Group, at either 847-370-9400 or <a href="mailto:LarryWRosser@aol.com">LarryWRosser@aol.com</a>.

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